

LAFCO Meeting: December 15, 2010

TO: LAFCO

FROM: Neelima Palacherla, Executive Officer
Dunia Noel, Analyst

**SUBJECT: 2010 COUNTYWIDE FIRE SERVICE REVIEW FINAL REPORT
AND SPHERE OF INFLUENCE UPDATES FOR FIRE DISTRICTS**
Agenda Item #5

STAFF RECOMMENDATIONS

SERVICE REVIEW REPORT AND SPHERE OF INFLUENCE UPDATES

1. Accept comments and consider any further revisions to the Revised Draft 2010 Countywide Fire Service Review Report.
2. Adopt the 2010 Countywide Fire Service Review Report (Service Review Report) with revisions as necessary.
3. Adopt service review determinations for each of the fire agencies as included in the Service Review Report.
4. Adopt sphere of influence (SOI) updates along with sphere of influence determinations for the four fire districts as included in the Service Review Report:
 - a. Retract the SOI for Santa Clara County Central Fire Protection District (CCFD) as recommended and depicted in the Service Review Report
 - b. Reaffirm the existing SOI for South Santa Clara County Fire Protection District (SCFD)
 - c. Establish a zero SOI for Saratoga Fire Protection District (SFD)
 - d. Retract the SOI for Los Altos Hills County Fire District (LAHFD) as recommended and depicted in the Service Review Report.
5. Direct staff to prepare the Final Report for the 2010 Countywide Fire Service Review and to distribute the Final Report to all the affected agencies.
6. Direct staff as necessary, to pursue further research / analysis of specific options identified in the Service Review Report and report back to the commission.

CEQA ACTION

1. Determine that the 2010 Countywide Fire Service Review Report and the updates to the sphere of influence of the four special districts are categorically exempt from CEQA under §15306 Class 6 and §15061(b)(3) General Rule of the CEQA Guidelines.

BACKGROUND

SERVICE REVIEW AND SPHERE OF INFLUENCE REQUIREMENTS

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code §56000 et seq.) requires that each LAFCO conduct service reviews prior to or in conjunction with the 5-year mandated sphere of influence (SOI) updates. A service review is a comprehensive review of municipal services in a designated geographic area in order to obtain information about services, evaluate provision of services, and recommend actions when necessary, to promote the efficient provision of those services. In Santa Clara County, service reviews are intended to serve as a tool to help LAFCO, the public and other agencies better understand the public service structure and to develop information to update the spheres of influence of the 29 special districts and 15 cities in the county.

As part of the service review, LAFCO must prepare an analysis and written statement of determinations regarding each of the following six categories:

- Growth and population projections for the affected area
- Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs or deficiencies
- Financial ability of agencies to provide services
- Status of, and opportunities for, shared facilities
- Accountability for community service needs, including governmental structure and operation efficiencies
- Any other matter related to effective or efficient service delivery, as required by commission policy.

As part of the sphere of influence update, LAFCO must prepare an analysis and written statement of determinations for each agency regarding each of the following categories:

- The present and planned land uses in the area, including agricultural and open-space lands
- The present and probable need for public facilities and services in the area
- The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide
- The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency
- The nature, location, and extent of any functions or classes of services provided by existing district (applies to special districts only).

The 2010 Countywide Fire Service Review is a review of countywide fire services in Santa Clara County and includes service review determinations for each of the fire service provider agencies in the County as well as sphere of influence recommendations and determinations for the four fire districts.

SERVICE REVIEW PROCESS

In December 2009, a Technical Advisory Committee (TAC) was established to select the consultant, serve as a liaison between LAFCO and the various affected agencies, and to provide technical expertise and guidance throughout the service review process. In addition to LAFCO Commissioner Pete Constant, the members of the TAC for the 2010 Countywide Fire Protection Service Review include:

Representing the Santa Clara County/Cities Managers' Association:

- Thomas Haglund, City Administrator, City of Gilroy

Representing the Santa Clara County Fire Chiefs' Association:

- Dale Foster, Fire Chief, City of Gilroy
- Ken Waldvogel, Fire Chief, Santa Clara County Central Fire Protection District
- Steven Woodill, Fire Chief, South Santa Clara County Fire Protection District

In February 2010, LAFCO retained Management Partners Inc. to conduct the 2010 Countywide Fire Protection Service Review. Arne Croce of Management Partners is the Project Manager for this service review.

As a first step, information regarding various aspects of fire service was gathered from each of the fire service agencies/providers in the County. The consultant made available a web site for agencies to upload the requested information. This information was then tabulated and sent to the fire agencies for verification. Follow-up information and further clarification was obtained through interviews with each service provider. In order to better reflect the current financial situation of various service providers, updated budget information for the current fiscal year was obtained. Criteria that would be used in making the required service review determinations was developed and reviewed with the TAC. Information gathered was analyzed and preliminary findings/analyses were discussed with the TAC through a series of meetings. Throughout the process, the Fire Chiefs' Association, the City Managers' Association and LAFCO were provided updates on the issues and progress of the service review.

A Draft Fire Service Review Report was then prepared containing a comprehensive review of fire protection and emergency medical response services in Santa Clara County along with service review determinations for all the agencies, sphere of influence recommendations for the four fire districts and an analysis of specific fire service issues identified in the Scope of Services.

On September 7, 2010, LAFCO sent a Notice of Availability/Public Hearing Notice to all affected agencies, LAFCO Commissioners, and other interested parties announcing the release of the Draft Service Review Report for public review and comment.

LAFCO received comments from several agencies on the Draft Report. LAFCO held a public hearing on October 20, 2010, to accept and consider public comment.

The Draft Report was then revised to address the comments received and a Revised Draft Report was released on the LAFCO website on November 3, 2010. A Notice of Availability for the Revised Draft Report was provided to all affected agencies and interested parties. See Attachment A for the Notice of Availability.

LAFCO received comments on the November 3, 2010 Revised Draft Report from the following agencies and interested parties as of December 9, 2010:

- Santa Clara County Central Fire Protection District
- City of Morgan Hill
- Sunnyvale Department of Public Safety
- San Jose IAFF Local 2030
- Santa Clara County Communications

Attachment B includes the comment letters received. Attachment C includes tables listing the above comments (and those submitted previously by the Palo Alto Fire Department and the Saratoga Fire Protection District) along with a response to how these comments have been addressed in the Revised Draft Report dated December 8, 2010. A redline and clean version of the December 8, 2010 Revised Draft Report is available on the LAFCO website.

ENVIRONMENTAL ANALYSIS

The 2010 Countywide Fire Service Review Report is intended to serve as an information gathering tool to help LAFCO, the public and other agencies better understand the fire protection service structure in Santa Clara County and to develop information to update the spheres of influence of fire districts and cities in the county. The Service Review Report consists of the following items:

- Overview of fire and emergency medical services system in Santa Clara County
- Profiles of all agencies providing fire protection services in Santa Clara County
- Issues related to current fire protection services and identification of alternatives for addressing those issues including service efficiency opportunities
- Service review determinations for all fire service agencies
- Sphere of influence recommendations and determinations for the four fire districts

LAFCO is not required to initiate boundary changes based on this service review. LAFCO, local agencies or the public may subsequently use the service review together with additional research and analysis where necessary, to pursue changes in jurisdictional boundaries. Any future changes in jurisdictional boundaries will be subject to CEQA.

The Service Review Report recommends the retraction of the SOI for LAHFD and for CCFD. These recommended changes do not affect service provision as these changes

are either in response to prior annexations by cities which actions determined service provision or as a result of inability of the district to provide services to the area.

Therefore, the Service Review Report is categorically exempt from CEQA under §15306 Class 6 and §15061(b)(3) General Rule of the CEQA Guidelines, as described below:

Class 6 consists of basic data collection, research, experimental management, and resource evaluation activities that do not result in serious or major disturbance to an environmental resource. According to the CEQA Guidelines, these may be strictly for information gathering purposes, or as part of a study leading to an action that a public agency has not yet approved, adopted, or funded.

Section 15061(b)(3) states that the activity is covered by the general rule that CEQA applies only to projects, which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.

SPHERE OF INFLUENCE RECOMMENDATIONS

In 2006, the City of Los Altos annexed two unincorporated islands (i.e. Woodland Acres and Blue Oak Lane) to the City. As part of the annexations, the City also detached Woodland Acres from CCFD and detached Blue Oak Lane from LAHFD as the City took over responsibility for fire protection services in these two areas. However, these two islands remained within the SOI of each respective fire district. Given that the two islands are within the City of Los Altos and that fire protection service is now the responsibility of the City of Los Altos, it is appropriate to retract the SOI of the CCFD and LAHFD to remove the area from the districts' SOI.

Additionally, LAFCO in September 2010, completed an annexation of approximately 22,000 acres of land in the Santa Cruz Mountains to the CCFD. The vast majority of these lands were located in the District's SOI. However, lands located in the southeastern end of the District's SOI were not included in the annexation due to lack of convenient access for the District to serve those lands. The Service Review Report recommends the retraction of CCFD's SOI to exclude these lands as the District has never served these remote lands and is unable to serve these remote lands.

The Service Review Report also recommends the establishment of a zero SOI for SFD as the district is completely surrounded by CCFD and contracts with CCFD for all services. Lastly, the Service Review Report recommends that LAFCO reaffirm the current SOI for the SCFD.

IMPLEMENTATION STEPS FOR EXPLORING SERVICE EFFICIENCY OPPORTUNITIES INCLUDING CHANGES IN GOVERNANCE STRUCTURE IDENTIFIED IN THE SERVICE REVIEW REPORT

In addition to the service determinations and sphere of influence recommendations for the fire agencies, the Service Review Report also discusses four key fire service issues including:

1. Options for funding and providing service to underserved areas in the County and the status of and best practices for roles and oversight of volunteer fire companies to provide services in these areas
2. Regional fire and emergency medical service delivery for the South County Region
3. Analysis of issues and efficiencies of fire districts contracting for service with another fire district
4. Assessment of other opportunities to improve service effectiveness or efficiency for fire service providers in the County

Options and potential opportunities for addressing each of these issues are also briefly discussed in the Report. The Commission at the October 20, 2010 public hearing, directed staff to prepare information on implementation of the options identified in the Service Review Report.

ISSUE #1: SERVICE TO UNDERSERVED AREAS AND ROLE OF VOLUNTEER FIRE COMPANIES

Currently a portion of lands in the Santa Cruz Mountains and the majority of the Mount Diablo Range in Santa Clara County are located outside of the boundary of a formal fire protection service provider. For the most part, these areas are dependent on responses from SCFD, CCFD, the cities of San Jose and Milpitas, CAL FIRE and some volunteer fire companies that provide limited services to very small portions of the underserved areas. Given the travel distance from adjacent public fire departments, response times to these areas are generally very long (i.e. in excess of 20 or 30 minutes for fire \ emergency medical response). The response to calls by public fire departments to these areas has two negative impacts on these agencies. First, with extended call response times, apparatus that is relied upon for service delivery within the jurisdiction's boundaries is unavailable for deployment. Second, these agencies receive no compensation for the cost of response.

The Service Review Report identifies three options for addressing this issue: (1) create a new fire district and/or expand an existing fire district; (2) create a joint powers authority; and (3) create a county service area.

Table 1 summarizes the options and identifies the key steps or analysis necessary to implement the options and indicates whether LAFCO action is required to implement the option.

TABLE 1: SERVICE TO UNDERSERVED AREAS AND ROLE OF VOLUNTEER FIRE COMPANIES

Option	What are key steps / analysis required prior to initiating action?	Agencies involved in implementing key steps /analysis		Does the action require a LAFCO application and approval?	Who may initiate a LAFCO application?
		Key agency	Other agencies		
Create a new fire district or expand existing fire district	<ul style="list-style-type: none"> • Develop a work plan • Determine boundaries for new district • Establish type/ level of service required • Determine funds required for service level • Identify potential source of funds • Identify service provider and governing body • Identify and establish best practices and policies for volunteer firefighter operations 	County	CCFD SCFD Cal FIRE San Jose Milpitas	yes	County CCFD SCFD Petition of property owners or registered voters within the proposed boundary of the fire district
Create a Joint Powers Authority	<ul style="list-style-type: none"> • Develop a work plan • Determine boundaries for new district • Establish type/ level of service required • Determine funds required for service level • Identify potential source of funds • Identify service provider and governing body • Identify and establish best practices and policies for volunteer firefighter operations 	County	CCFD SCFD CalFIRE San Jose Milpitas	no	NA
Create a County Service Area (CSA)	<ul style="list-style-type: none"> • Develop a work plan • Determine boundaries for new district • Establish type/ level of service required • Determine funds required for service level • Identify potential source of funds • Identify service provider and governing body • Identify and establish best practices and policies for volunteer firefighter operations 	County	CCFD SCFD CalFIRE San Jose Milpitas	yes	County Petition of property owners or registered voters within the proposed boundary of the fire district

There are many issues that must be considered and resolved before a preferred option can be identified. The following provides a brief overview of some of the many questions and issues that must be considered fully before moving forward.

1. Develop a Work Plan

- a. What is the scope and timeline for the study? Who would lead / manage the study?
- b. Should an advisory committee be formed to provide direction? What should be the composition of the committee? Should it be composed of staff from various departments and agencies or of members of governing bodies?

2. Determine Types and Levels of Service

- a. How should a needs assessment for fire service within the underserved areas be prepared? What type and level of services are required in the different parts of the underserved areas?
- b. Should a full array of fire protection services (structural & wild-land) and emergency medical response be provided to the entire underserved area or some variation in type of services for specific areas served, given some of the lands are designated state responsibility areas?
- c. What level of service and response times are feasible / acceptable and to what parts of the underserved area?

3. Determine Boundaries

- a. Should the underserved area be included in one district or in two /more districts given the geography of the area (i.e. underserved area includes lands in the Santa Cruz Mountains and lands in the Mount Diablo Range), and given the amount and type of existing development in the area, the potential for additional development to occur in the area, and the area's adjacency to different existing service providers?

4. Determine Funds Required for the Identified Level of Service

- a. How much will it cost to provide the preferred level of service to the underserved area and what is the costs breakdown by service type and service area?

5. Determine Potential Funding Sources

- a. What is the likelihood of agencies diverting existing funds to provide fire protection and emergency medical services to the underserved area? How much existing funds could be diverted?
- b. Can a sufficient amount of revenues (in the form of taxes or fees or assessments) be generated from the area to cover the cost of providing the preferred level of service to the area, given the number of properties involved, amount and type of development that currently exists in the area and given the potential for development that is likely to occur in the area based on the countywide growth management policies?

- c. What is the likelihood of voters approving a special tax, assessment, or supporting the establishment of fees to pay for some or all of the new services?
- d. What portion of property tax revenues would be transferred to fire agencies upon annexation of underserved areas?

6. Determine Service Provider(s) and Governing Body

- a. What agency or agencies are the logical service provider(s) given the current array of service providers and their adjacency to the underserved area?
- b. What kind of a governance structure should be established?
- c. What type of process is required to establish the governance structure?

7. Establish Policies and Best Practices for Volunteer Fire Company Operations

- a. What is the role of volunteer firefighter companies in the underserved area?
- b. Are more volunteer firefighter companies needed and if so in what area(s)?
- c. Who would provide training, equipment and workers compensation coverage for the volunteer fire companies and how would they be funded? Would there be a liability to the agencies for the actions of the volunteer fire companies?
- d. Who would provide any oversight for the volunteer fire companies?

This issue has now been a subject of two service review reports and repeatedly comes up as a major concern for fire service providers in this County. Pursuit of solutions to this long standing issue will require support and direction from the County of Santa Clara as it is the key agency with jurisdiction over these underserved lands. As the very first step, it is therefore necessary to seek the County's position on this issue.

ISSUE #2: REGIONAL FIRE AND EMERGENCY MEDICAL SERVICE DELIVERY OPTIONS FOR THE SOUTH COUNTY REGION

The cities of Morgan Hill and Gilroy and adjacent unincorporated areas constitute the "South County." Three fire/emergency services departments currently serve different parts of this area:

- Santa Clara County Central Fire Protection District serves the City of Morgan Hill by contract.
- The Gilroy Fire Department serves the City of Gilroy.
- South Santa Clara County Fire Protection District, through a contract with CAL FIRE, serves some unincorporated areas in South County.

The service agencies have different staff practices, response standards and apparatus deployment policies. There is a high degree of interdependence between the agencies due to the large geographic area and range of suburban and rural deployment. This interdependence is evident in the high degree of mutual/automatic aid that occurs between the agencies. These agencies have established a multi-agency group and have been working together since May 2009 to explore the potential benefits of regionalization to achieve an improved system with lower costs. Over the past year, the

group has developed a general consensus on the current state of fire protection services in the South County region and a forecast for the region.

On November 10, 2010 the multi-agency group discussed a range of options to achieve regionalization of fire/EMS: from opportunities for interagency collaboration within the existing framework to options for consolidating fire and EMS services in South County. The group also prepared a report that includes a preliminary analysis of the options by addressing the issues of governance, management, and financing.

The multi-agency group agreed that the individual governing bodies should independently discuss the conditions in which each agency is interested in pursuing regionalization. The goal is for each agency to provide its conditions by early February 2011 so that the group can meet again in February or March to review the information and determine the study's next steps. LAFCO staff will continue to follow the group's efforts as they move forward and provide updates to the Commission.

ISSUE #3: ISSUES AND EFFICIENCIES OF FIRE DISTRICTS CONTRACTING FOR SERVICE WITH ANOTHER FIRE DISTRICT

The SFD is an independent special district governed by a three-member elected board. The District covers a portion of the City of Saratoga and the adjacent unincorporated area. With CCFD's recent annexation of unincorporated lands in the area surrounding SFD, CCFD now completely surrounds the SFD. In 2008, following the success of a management agreement between CCFD and SFD, the two agencies entered into a full-service contract, whereby SFD employees were transferred to CCFD. Although almost all of SFD's budget is for the service contract with CCFD, the District remains an independent district with its board. Both the 2004 Countywide Fire Service Review and the current Service Review Report have indicated that other governance options may be more efficient given the status of the SFD.

The LAHFD was created as a dependent district of Santa Clara County and the County Board of Supervisors appointed a seven-member commission that is responsible for the oversight of fire protection activities within the District. Up until 1996, the LAHFD contracted with the City of Los Altos for fire services. At which time, the LAHFD and the City of Los Altos each separately began to contract with CCFD for fire and emergency services. LAHFD provides services outside of the CCFD contract including brush clearance and hydrant maintenance and contracts for a fire consultant and for clerical support. Both the 2004 Countywide Fire Service Review and the current Service Review Report have indicated that other governance options may be more efficient for the LAHFD.

TABLE 2: GOVERNANCE OPTIONS FOR FIRE DISTRICTS CONTRACTING FOR SERVICE

Options	What are key steps / analysis required prior to initiating action?	Agencies involved in implementing key steps /analysis		Does the action require a LAFCO application and approval?	Who may initiate a LAFCO application?
		Key agency	Other agencies		
Dissolve SFD and annex lands to CCFD	<ul style="list-style-type: none"> • Determine the appropriate LAFCO process/processes for such proceedings • Conduct more detailed analysis to determine cost savings and any potential fiscal impacts • Determine any potential impacts to current service levels in the community 	LAFCO	SFD CCFD	yes	LAFCO SFD Petition of property owners or registered voters within the area
Dissolve LAHFD and annex lands to CCFD	<ul style="list-style-type: none"> • Determine the appropriate LAFCO process/processes for such proceedings • Conduct more detailed analysis to determine cost savings and any potential fiscal impacts • Determine any potential impacts to current service levels in the community 	LAFCO	LAHFD CCFD	yes	LAFCO LAHPD Petition of property owners or registered voters within the area

The following provides an overview of the type of issues that must be considered prior to initiating action for the above listed options:

1. Determine Appropriate LAFCO Process

- What is the appropriate LAFCO process for achieving the change in governance – is it simply a dissolution of the fire district with CCFD as successor agency, or does the area have to be annexed into CCFD following the dissolution?
- What is the process or method for transfer of property tax following a change in organization?

2. Determine Cost Savings and any Fiscal Impacts

- How much savings can be achieved through a change in governance?
- Would change in governance impact the total amount of revenues available for fire protection in the community?
- What are the fiscal impacts to the CCFD as a result of the governance change?
- How would the vast amount of reserves held by LAHFD be addressed?

3. Determine any Impacts to Current Service Levels

- a. In the case of SFD, how would the Early Warning Alert System (EWAS) be implemented and funded?
- b. Would the special services such as hydrant maintenance and brush clearance currently provided by LAHFD be maintained / continued?
- c. How would a change in governance impact the local community with regard to participation and accountability?

Staff recommends that the Commission direct staff to work with the involved agencies in order to answer these questions and report back to the Commission.

ISSUE #4: ASSESSMENT OF OTHER OPPORTUNITIES TO IMPROVE SERVICE EFFECTIVENESS OR EFFICIENCY FOR FIRE SERVICE PROVIDERS IN THE COUNTY

The Service Review Report discusses additional potential opportunities for economies and efficiencies in the fire and emergency service delivery system including in the areas of:

- Consolidation of Communications
- Consolidation of Stations and Apparatus
- Competitive Service Contracting
- Strategic Paramedic Placement
- Training for Fire Personnel
- Fire Prevention Services
- Apparatus Maintenance
- Apparatus Purchasing
- Other Service Delivery Changes

Further evaluation of these areas and specific options is required to assess service and financial impacts. For the most part, these opportunities involve changes to the operations or administration of the fire service delivery system and do not require changes in jurisdictional boundaries or governance and therefore will not require a LAFCO application /action. Any of the involved agencies may initiate discussion and further pursue these options.

NEXT STEPS

Upon adoption of the Final Service Review Report by the Commission, staff will make any necessary or directed changes to the Report. The Final Service Review Report will be distributed to all the affected agencies and posted on the LAFCO website. If directed, staff will pursue research / further analysis of the identified issues and report back to the commission.

ATTACHMENTS

- Attachment A: Notice of Availability for the Revised Draft Report dated November 3, 2010 and public hearing notice of the December 15, 2010 LAFCO Public Hearing
- Attachment B: Comment letters received prior to December 8, 2010 on the Revised Draft Service Review dated November 3, 2010. Note:
- Attachment C: Tables listing each of the comments received prior to December 8, 2010 and proposed responses to the comments. The tables also include comments from SFD and the City of Palo Alto since they were not addressed prior to the October LAFCO hearing.

Note: The redlined and clean version of the Revised Draft Countywide Fire Service Review Report dated December 8, 2010 is available on the LAFCO website. www.santaclara.lafco.ca.gov



Date: November 3, 2010
To: Fire Chiefs
City Managers and County Executive
Interested Parties
From: Neelima Palacherla, LAFCO Executive Officer
RE: **NOTICE OF AVAILABILITY & FINAL PUBLIC HEARING:**
2010 REVISED DRAFT COUNTYWIDE FIRE SERVICE REVIEW REPORT

Revised Draft Countywide Fire Service Review Report Available for Public Review and Comment

The Revised Draft Countywide Fire Service Review Report is now available for public review and comment on the LAFCO Website (www.santaclara.lafco.ca.gov) under "What's New." For your convenience, a copy of the Revised Draft Report with the tracked changes shown is also provided. The Revised Report presents a comprehensive review of fire protection and emergency medical response services in Santa Clara County. It also includes service review determinations for the agencies and sphere of influence recommendations for the four fire districts.

You may provide written comments on the Revised Report by mail to: LAFCO of Santa Clara County, 70 West Hedding Street, 11th Floor, East Wing, San Jose, CA 95110 OR you may email your comments to: neelima.palacherla@ceo.sccgov.org OR dunia.noel@ceo.sccgov.org.

Written comments received by December 1st will be included and addressed in the staff report that will be provided to the LAFCO Commission in advance of the December 15, 2010 Final Public Hearing. Written comments received after December 1st will be provided to the LAFCO Commission at the December 15, 2010 Final Public Hearing and addressed at that time.

LAFCO Final Public Hearing on the Revised Report: December 15, 2010

LAFCO will hold a Final Public Hearing to consider the 2010 Revised Draft Countywide Fire Service Review Report and to adopt the Report.

LAFCO Public Hearing: December 15, 2010
Time: 1:15 P.M. or soon thereafter
Location: Board Meeting Chambers
70 West Hedding Street, San Jose, CA 95110

Following the Final Public Hearing, LAFCO will finalize the Report and notify affected agencies and interested parties concerning its availability. The Final Report will be available on the LAFCO website for downloading and on file in the LAFCO Office.

Please feel free to contact me at (408) 299-5127 or Dunia Noel, LAFCO Analyst, at (408) 299-5148 if you have any questions or concerns. Thank you.

Cc: City Council Members and Board of Supervisors
LAFCO Commissioners



ITEM NO. 5

ATTACHMENT B

Morgan Hill

17555 Peak Avenue

Morgan Hill, CA 95037

Tel: 408-779-7271

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www.morgan-hill.ca.gov

November 16, 2010

Ms. Neelima Palacherla, LAFCO Executive Officer
LAFCO of Santa Clara County
70 West Heeding, 11th Floor, East Wing
San Jose, CA 95110

Re: LAFCO 2010 Countywide Fire Service Review

Dear Ms. Palacherla,

Thank you for responding to the City of Morgan Hill's initial comments and for providing a copy of the Revised LAFCO 2010 Countywide Fire Service Review Draft Report. The purpose of my letter is to provide you with our comments prior to LAFCO's Public Hearing scheduled for December 15, 2010, and to provide a brief update on the status of the South County regionalization efforts.

Regionalization Update

On November 10, 2010, the South County regional study ad-hoc committee reconvened to discuss a range of options to achieve regionalization of fire/EMS: from opportunities for interagency collaboration within the existing framework to options for consolidating fire and emergency medical services in South County. The report also included a preliminary analysis of the options by addressing the issues of governance, management, and financing.

At the conclusion of the meeting, the ad-hoc committee agreed that the individual governing bodies should independently discuss the conditions in which each agency is interested in pursuing regionalization. The goal is for each agency to provide its conditions by early February 2011 so that the ad-hoc committee can meet again in February or March to review the information and determine the study's next steps.

I have attached a complete copy of the November 10 report for your review. As part of your staff report, we would appreciate LAFCO addressing the following points.

Study Comments

Section 5.2; Page 127:

After the final paragraph, the City recommends that LAFCO insert the "South County Regional Fire/EMS Expenses & Assessed Valuation" graph and the following paragraph. Both of these are from the November 10 report.

Over the past year, the South County agencies have adopted budgets and changes to cost structure needed to meet the fiscal challenges of declining revenues. As part of the South County regional study, the region's change in assessed valuation

and expenditures for fire and EMS from FY 2005/06 to present was evaluated. As expected, the region's total assessed valuation has declined the past two years. At the same time, although Gilroy has reduced its fire service costs, other agency fire service cost increases have counteracted that effect and the region's total fire and emergency medical services expenses have ultimately increased.

Section 5.2; Page 129:

In the first paragraph, the revised draft report states that "SCFD is the lowest cost provider of service on all measures analyzed." However, the revised numbers in Table 84 indicate that CCFD is the lowest cost provider on a per capita measurement, while SCFD is the lowest cost provider on per company and per sworn personnel measurements. The City would also appreciate LAFCO revising Table 84 "Service Population" column to show Morgan Hill's population at 40,200.

Section 5.2.1; Page 129:

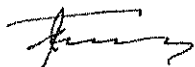
At conclusion of this section, the City recommends adding the following narrative so that this information is formally included in LAFCO's report.

On November 10, 2010, the South County regional study ad-hoc committee discussed a range of options to achieve regionalization of fire/EMS: from opportunities for interagency collaboration within the existing framework to options for consolidating fire and emergency medical services in South County. The report also included a preliminary analysis of the options by addressing the issues of governance, management, and financing.

At the conclusion of the meeting, the ad-hoc committee agreed that the individual governing bodies should independently discuss the conditions in which each agency is interested in pursuing regionalization. The goal is for each agency to provide its conditions by early February 2011 so that the ad-hoc committee can meet again in February or March to review the information and determine the study's next steps.

Thank you again for this opportunity to provide comments. We appreciate LAFCO's efforts and look forward to discussing the revised draft report further on December 15th.

Sincerely,



J. Edward Tewes
City Manager

CC: Steve Tate, Mayor
Larry Carr, Council Member
Marby Lee, Council Member
Marilyn Librers, Council Member
Greg Sellers, Council Member
Rich Constantine, Council Member Elect
Gordon Siebert, Council Member Elect
Steve Rymer, Director of Recreation and Community Services

City of Gilroy/City of Morgan Hill/Santa Clara County
South County Regionalized Fire Protection and EMS Service Delivery Study

Multi-Agency Ad-Hoc Steering Committee
Policy Phase

POLICY GROUP INTERIM REPORT

November 10, 2010

Executive Summary

The three public agencies responsible for fire and emergency medical services in South County (the City of Gilroy, the South County Fire District, and the City of Morgan Hill) and the two respective service providers (County Fire and CALFIRE) have been exploring the potential for an improved system at lower cost through regionalization.

Earlier, a Working Group led by the Fire Chiefs determined that the benefits of regionalization were operationally and technically feasible. The group also identified issues to be addressed in any integrated regional solution, and suggested some immediate opportunities for collaboration.

The Ad-Hoc Committee formed a Policy Group (the City Administrator of Gilroy, the County Chief Executive Officer, and the City Manager of Morgan Hill) and asked it to evaluate the policy issues surrounding regionalization including: governance, management, and financing.

This interim report from the Policy Group outlines a range of options to achieve regionalization of fire and emergency medical services: from opportunities for interagency collaboration within the existing framework to options for consolidating fire and emergency medical services in South County. The interim report includes a preliminary analysis of the options by addressing the issues of governance (setting service levels and budgets), management (ensuring efficient and effective service delivery), and financing (paying for the costs of the service delivery system).

At the same time that the Policy Group has been evaluating alternatives, other important studies and actions that may impact the policy analysis have also occurred:

- LAFCO is completing its periodic "service review" of fire services throughout the County, and is considering a draft report from its consultants that provides valuable data and findings regarding options for South County.
- The City of Gilroy has recently made significant changes in its cost structure and service levels for fire and emergency medical services.
- The County is implementing a new countywide contract for paramedic ambulance transport services that will lead to a new private provider and changes in relationships with public fire departments and their respective communications' centers.

- The Silicon Valley Regional Interoperability Authority (SVRIA) has initiated discussions about interconnecting communication centers through computer aided dispatch (CAD).

Finally, the interim report outlines a series of policy questions for the Ad-Hoc Committee and the respective governing bodies of the three public entities (please refer to page 7 for a complete narrative):

1. Are the benefits of regionalization sufficiently clear and compelling that the entities are prepared to invest taxpayer dollars in developing a specific action plan to be considered for implementation? If yes, which of the various options is the preferred alternative?

OR

2. Should immediate opportunities and issues be addressed prior to consideration of any changes in the existing framework? That is, should the issues of battalion chief coverage, equity of cross border responses and integration of emergency voice and data communications be addressed before there are any concrete steps taken toward a fully integrated regional service delivery system?

Based on the answers to these questions, the Policy Group would be prepared to recommend a path to achieve the chosen goal.

Background:

The three agencies responsible for providing fire and emergency services to South County have undertaken a systematic study of the feasibility and desirability of a consolidated, regional approach. The City of Gilroy maintains a city staffed fire service. The South County Fire District contracts with CALFIRE for protection of the unincorporated area. The City of Morgan Hill contracts with County Fire.

Existing South County Region Service Delivery Structure

Authority	Provider	Governing Body
City of Morgan Hill	County Fire (contract)	Morgan Hill City Council
City of Gilroy	City Fire Department	Gilroy City Council
South County Fire District	CALFIRE (contract)	County Board of Supervisors

Each agency and each service provider relies on the others in order to respond to emergencies effectively. Yet, nearly every independent review of the service delivery system in South County has suggested that overall service could be improved at savings in costs by more structured collaboration.

In 2004, the Local Agency Formation Commission (LAFCO) completed a “service review” of fire services in the entire County. For South County, the service review concluded:

Given existing populations and the growth potential of the South County Region together with the somewhat fragmented service delivery model currently found in this region, the potential exists to create a regional service delivery model that could provide for higher levels of service more cost effectively, than might be attainable from individual agencies providing separate delivery systems.

In May 2009, the Governing bodies of the three public agencies formed a Working Group and established a process to evaluate alternatives. The Working Group was briefed on the many different separate master plans that had been prepared over the decade. One of the first steps was a technical and operational review by the Chiefs of the three service providers to determine whether regionalization was feasible. The Chiefs were asked to only consider the operational aspects of a regional approach, leaving to a subsequent step the review of policy issues of governance, management and financing.

The technical review concluded that regionalization was feasible. The review also concluded that the existing system itself could be improved provided the agencies: 1) establish standardized response plans and operating policies; 2) establish real time information at each of the three communication centers to monitor the availability of staff and equipment; and 3) provide constant coverage by a minimum of two battalion chiefs. The review also suggested a policy issue relating to an imbalance of responses provided from South County to Morgan Hill and to a limited extent from Gilroy to South County.

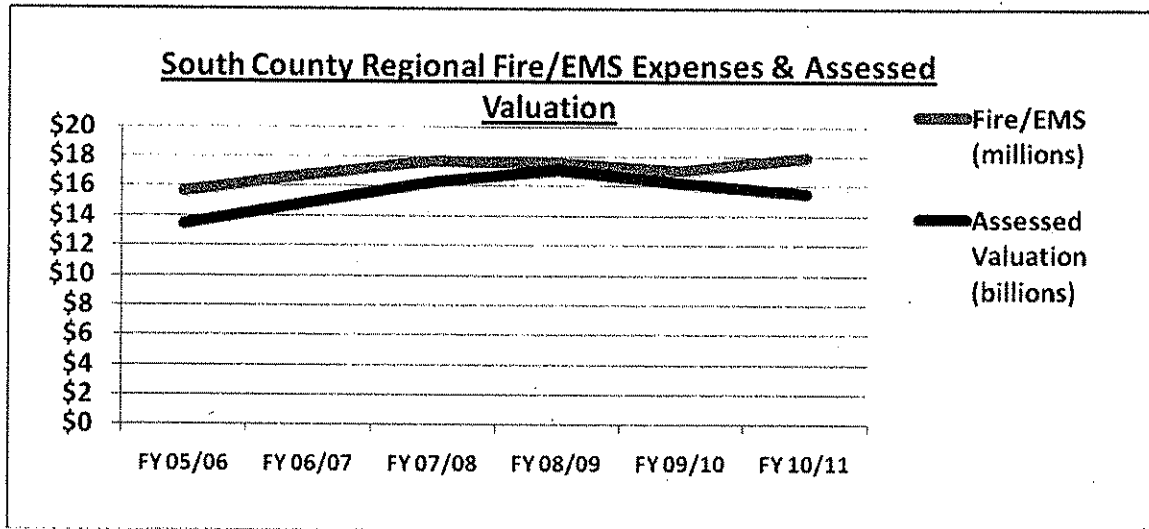
The three service providers have already implemented the recommendation to provide BC coverage and the three agencies have provided the necessary funding. A full evaluation of this pilot program is yet to be completed.

Nearly a year ago, in December 2009, the Ad-Hoc Committee asked a Policy Group to evaluate the policy issues of governance, management and financing of a regional model. The technical group also suggested that the Policy Group address the policy issues of how to improve the current system "prior to implementing a regional model." It was expected that the Policy Group report would be available in June 2010, and that following a recommendation by the Working Group, the governing bodies of the three agencies would be asked to concur in an action plan.

Because LAFCO was conducting its State mandated five year service review, it was suggested that the Policy Group report be delayed in order to take advantage of the extensive data collection and analysis that was anticipated. Although LAFCO has not yet adopted the service review, a draft report from its consultant concludes:

There are several options available to the policymakers of the jurisdictions responsible for fire and emergency medical services in the South County to maintain appropriate service at reduced costs. Crafting a solution that meets the interests of all responsible agencies requires agreement about two variables: a structure for service provision (new government entity, joint powers agreement, or selection of a common contractor) and a provider for service delivery (one or a combination of the three current providers in the area.)

Over the past year, the agencies have adopted budgets and changes to cost structure needed to meet the fiscal challenges of declining revenues. As part of its evaluation process, the Policy Group reviewed the region's change in assessed valuation and expenditures for fire and EMS from FY 2005/06 to present. As expected, the region's total assessed valuation has declined the past two years. At the same time, although Gilroy has reduced its fire service costs, other agency fire service cost increases have counteracted that effect and the region's total fire and emergency medical services expenses have ultimately increased.



In the light of those changes, the Policy Group believes it is appropriate to test the continuing interest in a consolidated, regional approach.

The governance options are fairly clear and have been identified in both the 2004 (Attachment A) and 2010 LAFCO service reviews. In the next section, the Policy Group provides some additional analysis and suggests some policy questions and criteria that might be helpful to selecting a preferred option.

Options for a Consolidated, Regional Fire and Emergency Medical Services Delivery System in South County

Option 1. Each of the three agencies contract with a single provider.

Governance. This approach allows for seamless service delivery within the South County region and will address the need for a single communication center. Costs could be lower than otherwise the case if the selected vendor had a lower cost structure than that of the current providers combined costs. Because each agency could determine its own service levels (stations and staffing patterns) concerns about inequity of cross boundary responses would remain. This inequity might be exacerbated by different growth patterns in each community.

Management. A single provider would have a single responsible Fire Chief to provide seamless service delivery. However, the Chief would be responsible for three separate contracts, reporting to three different administrators.

Financing. Each entity would be responsible for paying for its preferred service delivery from its own available resources. If the selected provider was other than County Fire, the City of Morgan Hill would have to address how to finance the acquisition of fire stations and apparatus in Morgan Hill that are currently owned by County Fire.

Option 2. The three entities create a Joint Powers Agency which contracts with a single provider.

Governance. This model provides for a “regional” service delivery model with governance by a JPA Board selected by the governing bodies of the three entities. The JPA could establish a regional service level, but responsibility for paying its “fair share” would remain with each individual entity. The JPA agreement itself would be the focus of all the policy issues surrounding equity concerns, but once in place the JPA could achieve some of the benefits of regionalization.

Management. The JPA could appoint a single administrator (either from one of the member agencies or a dedicated staff person) to administer the contract.

Financing. The JPA would establish the service level and annual budget, and pursuant to the terms of the agreement, would assign a fair share to be paid by each entity. One of the agencies, South County Fire District, has only one revenue source (property tax) and no other services to reprioritize. Accordingly, there could develop a mismatch between fair share costs and revenues available. If the selected provider was other than County Fire, the JPA would have to address how to finance the acquisition of fire stations and apparatus in Morgan Hill that are currently owned by County Fire.

Option 3. Annex the two cities to the existing South County Fire District and select a single provider.

Governance. The County Board of Supervisors is the governing body for the District and establishes service levels and approves annual budgets. It is advised by a Fire Commission currently selected from residents and property owners of the unincorporated areas. The Board of Supervisors could choose to expand the current contract with CALFIRE, contract with County Fire, contract with Gilroy Fire, or establish its own public fire service provider. The advantages of a “sub regional” model might be multiplied if the provider in South County also has the responsibility for other areas within the County.

Management. The city councils and city managers would not have any management responsibility for Fire and EMS service. The fire service provider would report to the Board of Supervisors through the County CEO.

Financing. It is assumed that upon annexation to the district, the two cities would transfer a portion of their property tax base to the district with the result that future funds available would be entirely dependent on growth in assessed valuation within the district. This has the effect of permanently reducing discretionary revenues of each city, but transferring service delivery and financing responsibility to the district.

Option 4. Establish a new independent fire district and select a single provider.

Governance. The new district could have a separately elected governing board, which could be “at large” or with seats representing different geographic areas. The governing board would establish service levels and annual budgets based on available revenues. Each agency would transfer its assets and liabilities to the new district, along with an agreed upon amount of its property tax base. The district could establish its own public fire service provider based on a desirable cost structure or it could contract with a single provider.

Creation of a new district, or annexation to an existing district, requires LAFCO action. The LAFCO process requires a detailed service plan and fiscal analysis prior to initiating any change in organization.

Management. The new district would appoint a Fire Chief and such other management personnel as necessary to ensure efficient and effective service delivery.

Financing. The two cities would give up some discretionary revenues, and may be required to establish development impact fees to finance capital costs of increased capacity to meet new growth. The establishment of a new district could be tied to the successful passage of a revenue measure to partially or completely offset the revenues currently provided by the three entities.

Option 5. Establish a County Service Area and select a single provider.

Governance. The Board of Supervisors would be the governing body and would establish service levels and annual budgets. The city councils would not have any responsibility for providing or financing fire and emergency medical services. The Board would select a single provider.

Management. The CSA would be administered by the County CEO reporting to the Board of supervisors. The Fire Chief of the single provider would report to the Board.

Financing. Under this option 2/3 of the voters of the proposed CSA could approve a parcel tax to partially or completely offset the revenues currently provided by the three entities.

Policy Questions

Before an action plan can be developed it is important to get clarity on the policy objectives of a possible consolidated, regional service delivery model. Previously, the Working Group suggested a subset of policy questions that focus on improvements to the existing system without having to move toward a regional approach. The Policy Group recommends that the AD-Hoc Committee review the two policy questions and provide direction on the next steps. The two primary questions are as follows:

1. Regional Approach

Are the benefits of regionalization sufficiently clear and compelling that the entities are prepared to invest taxpayer dollars in developing a specific action plan to be considered for implementation? If a consolidated regional approach is to be pursued, is it more important to maintain some city involvement? Or is an independent district with a separate governing board and revenue base preferable?

- a. Option 1. Each of the three agencies contract with a single provider.
- b. Option 2. The three entities create a Joint Powers Agency which contracts with a single provider.
- c. Option 3. Annex the two cities to the existing South County Fire District and select a single provider.
- d. Option 4. Establish a new independent fire district and select a single provider.
- e. Option 5. Establish a County Service Area and select a single provider.

OR

2. Existing Approach

Should immediate opportunities and issues be addressed prior to consideration of any changes in the existing framework? That is, should the issues of battalion chief coverage, equity of cross border responses and emergency communications be addressed before there are any concrete steps taken toward a fully integrated regional service delivery system?

- a. If marginal improvements are the focus, are each of the agencies prepared to participate fully and share the costs of studies to integrate communications and address cross border inequities?
- b. Do the recent changes in cost structure for Gilroy and the potential for marginal improvements in the current system suggest that regional efforts should be put "on the back burner"?

Subject: FW: LAFCO Revision (Nov 3) Comments for Sunnyvale

From: Ron D'Alba [rdalba@ci.sunnyvale.ca.us]
Sent: Wednesday, November 24, 2010 10:16 AM
To: Arne Croce; Suzanne Harrington
Cc: Dave Pitts; Jeffrey Plecque; Steven Drewniany
Subject: LAFCO Revision (Nov 3) Comments for Sunnyvale

Suzanne/Arne

Thank you for all of your patience in dealing with the difficulties of including a Public Safety agency in your evaluation of the Fire Service. Most of the comments I have left were mentioned either in response to your questions or when we last provided comments.
RON

The comments I still have are as follows:

- There is no discussion of the unique nature of DPS and how it would make LAFCO's call for consolidation with MTV and SNC difficult. You must remember that SNY BCs also fill the role of Police Watch Commander in SNY. A MTV or SNC BC could not do that.
- Page 27 - HAZMAT Typing....The current version is unedited from the first. Here are the original comments I submitted then.
 - Page 27 Hazardous Materials Response
 - Only two agencies have passed the formal Typing by the State of California. Santa Clara County Central is a Type 1. SNY is a Type 2. I believe San Jose has to-date not passed the State requirements as a Type 1.
- Page 138 - No mention of the Public Safety Concept and the consolidation issues

- **Page 138 (5.13.1) Combining Departments**
 - There should be some indication of the Public Safety Concept and that the movement to fire consolidation would require additional staff to place the County standard of 3 on an apparatus and would defeat the Public Safety model
- **Page 138 (5.13.2) Shared Battalion Chiefs**
 - In order to meet this area, the shared resources would also need to have Law Enforcement so they assume a Law Enforcement Command Role as required.

• **Page 164 - no identification of the addition of civilian professionals to address costs**

- **Page 164** Staffing has increased 14% between FY 2007-08 and FY 2010-11.
 - This was due to Department reporting structure reorganization and not the addition of Staff. We should make sure that is reflected properly to not give the impression we added staff when in fact we are removing SWORN Staff and replacing with Civilian Professionals.

• **Page 254...Still show's 11 engines still not 9**

- How many companies does the Sunnyvale Fire Department staff daily?
 - Sunnyvale Staffs 9 Engine Companies, 2 Truck Companies and a HazMat Company 24/7. We also have two Engines (unstaffed) in Reserve.

• **TABLE 86...Operating Costs**

- Analyzing the data poses some contradiction, because of the Public Safety Model. Specifically, because we minimally staff a Fire Service augmenting it with Patrol resources, our cost per firefighter appears high. However, all other metrics are extremely low, or are the lowest of all cities, as one would expect. This is merely the mathematics of dividing the overall budget by minimally staffed service. I think that some (particularly the media) will focus on the sensational aspect of one metric and ignore all others. It would be extremely helpful, and I believe more valid to separate Sunnyvale from the rest of the table, through a break in the rows, heavy borders and/or shading of the whole row with adjacent comment instead of just a footnote (#9).

END OF NEW COMMENTS FOR NOV 2010 Revision

**WYLIE, MCBRIDE,
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Direct Dial Number

November 30, 2010

Via E-mail neelima.palacherla@ceo.sccgov.org

Neelima Palacherla, Executive Officer
LAFCO of Santa Clara County
70 West Hedding Street, 11th Flr., East Wing
San Jose, CA 95110

**Re: Draft Countywide Fire Service Report
Comments of IAFF Local 230**

Dear Ms. Palacherla:

This letter constitutes written comments by our client, the San Jose Firefighters, IAFF Local 230 regarding the above-referenced Revised Report.

Local 230 expressly requests that the Commission address these comments with respect to the contents of the Revised Report, especially those set forth in Table 86 on page 138. Table 86 purports to set forth the "Cost Factors for Provider Agencies," but by Local 230's review suffers from serious errors and deficiencies.

As an opening matter, it is important to note that the Revised Report does not set forth any workload assessment, i.e., the number of calls per service per firefighter in each agency listed. The focal point of Table 86 seems to be that by using a 3-person company as a benchmark the Revised Report expresses the operating cost per each 3-person company per agency. Simultaneously, however, because the San Jose Fire Department operates with a minimum of 4-person companies, it appears, incorrectly, that the operating cost per daily staffed apparatus in San Jose is considerably higher than other agencies within the County. This analysis both disregards a workload assessment between agencies and incorrectly suggests that the operating costs for daily staffed apparatus in San Jose is higher than the comparison departments.

The Data for the San Jose Fire Department and Calculations Need Correction

There are many data issues presented in the Revised Report, especially as relates to San Jose, that using the raw data used to calculate any analysis is highly questionable. For example:

- San Jose Fire Department does not staff single truck apparatus with six personnel.
- The Revised Report includes Airport operation costs (staffing, payroll) while frequently excluding the services (apparatus, station) in much of the analysis.
- The Revised Report indicates that SJFD operates a "Rescue Medic 28", which does not exist.
- The report indicates that the department's ISO rating "varies from 3 to 9", but later reports correctly that the City and the department do not participate in any ISO rating.
- The Revised Report states "Engines are replaced at 17 years; trucks at 20 years." In fact, apparatus are only evaluated for replacement at that time and the department operates many apparatus well beyond 20 years.
- The Revised Report states "All line apparatus are consistent with the replacement cycle." In fact, the department operates numerous line apparatus that exceed these timelines, including Engines dating from 1983-1990 and a Truck from 1988. All are front line apparatus.
- The Revised Report correctly identifies that the department does not operate designated "reserve" apparatus, but goes on to state the department only operates 29 engines. Further, the report states there is one USAR apparatus when in fact there are two USAR apparatus staffed daily.
- The Revised Report includes some dedicated staffed "overhead" apparatus, such as Battalion Chief vehicles, while excluding others, such as the Public Information Officer, Duty Chief, Command Van and others. Further, the report excludes other apparatus such as Foam 29, etc.
- The Revised Report indicates that Station 34 is staffed with Light Unit 34, which does not exist at Station 34 or any other station.
- The Revised Report incorrectly depicts the placement of numerous apparatus, such as Water Tender 2, Truck and Rescue Medic 4, etc. In some areas of the report, apparatus deployment from 2009 is reflected, while in other areas, apparatus deployment from 2010 is reflected (impacted by the

closure of four engines and one truck company). In some cases, the new apparatus placement configuration is matched to old response data, incorrectly displaying the utilization of each apparatus.

- "Calls for service" throughout the report are not accurately defined and do not reflect the actual utilization of each apparatus, significantly understating their use.

The above is a brief list of the items that are immediately apparent in the report. A more thorough evaluation would likely yield further inaccuracies requiring correction before the report can be used to effectively understand and compare the department's services.

Incorrect 4-Person Staffed Data Leads To Incorrect Analysis And Conclusions

One significant area that deserves attention is the data contained on page 138, in Table 86: Cost Factors for Provider Agencies. SJFD "4-person staffed" data appears erroneous.

The report includes "Truck, Engine, Rescue, and Transport" within the definition of 4-person staffing. In FY 2010-11, the SJFD operates engines 1-19, 21-29, and 31, for a total of 29 engines. It operates Trucks 1, 2, 9, 13, 14, 16, 29, 30 and 35 for a total of nine trucks. It operates Urban Search and Rescue Apparatus 5A and 5B, Hazardous Incident Team 29A, and Crash Rescue 20C and 20D with full-time staffing for a total of 5 rescues. It operates Rescue Medics 4, 18, 29, and Medics 22 and 31 for a total of 5 transports (or "rescues" if so labeled). That combines for a total of 48 apparatus. This does not yet include the SJFD's four Light Unit Rescue Apparatus (Light Unit 2, Light Unit 9, Light Unit 14 and Light Unit 16) which also have dedicated year-round full-time staffing.

The Revised Report does not recognize battalion chief apparatus (five in number) even though the salary costs for "battalion chiefs" are specifically included in the Department's FY 2010-11 Operating Budget Data used as the numerator for the Revised Report's "operating costs per" calculation.

And finally, the Revised Report does not reflect that the SJFD operates two Type IV Engines (i.e., brush patrols) with dedicated staffing on a year round basis and another five Type IV Engines with dedicated staffing for approximately eight months of the year ($5 \times 3/4 = 3.75$ full-time equivalents).

If one were to simply add the correct numbers (48 Apparatus, 5 Light Unit Rescue's, 2 full-time Type IV Engines, and 3.75 part-time Type IV Engines the Revised Report should reflect a total of 58.75 trucks, engines, rescues and ambulances in full time operation with dedicated staffing (not cross-staffed) for a cost of \$2,160,449 per apparatus (i.e., \$126,926,383 divided by 58.75 apparatus = \$2,160,449 per apparatus). That is a figure that is 30% less than the

\$3,095,765 indicated in Table 86 of the Revised Report and does not account for the Revised Report's data of inclusion of battalion chief's costs and exclusion of battalion chief apparatus and airport expenses questions.

This further impacts the "number of three person company equivalents" and "three company equivalent" calculations contained within the same table.

Further, this table in the Revised Report is inaccurate and should NOT reflect that the San Jose Fire Department operates:

- 32 apparatus with 4 person crews
- 8 apparatus with 5 person crews
- 1 apparatus with a 1 person crew

The Revised Report SHOULD accurately reflect that the San Jose Fire Department operates:

- 21.25 apparatus with 4 person crews
- 2 apparatus with 5 person crews
- 8 apparatus with 3 person crews
- 26.5 apparatus with 2 person crews
- 1 apparatus with a 1 person crew

This means that where converting to use of 3-person companies, the San Jose Fire Department operates 58.75 apparatus. Using the figure 58.75 apparatus drops the cost per apparatus to \$2,160,449 and drops the San Jose Fire Department's "3 person effective" cost per apparatus to \$2,201,036.

These changes accurately reflecting the true staffing conditions of the San Jose Fire Department demonstrate that the SJFD is very cost effective for the number of companies it operates and compares favorable no matter whether you are using existing companies of "normalized" companies as Table 86 attempts to reflect.

The Revised Report Fails to Analyze Firefighter Workload

For fiscal year 2009-10, the San Jose Fire Department sent an apparatus company (defined as an individual apparatus, or a company which includes multiple pieces of apparatus) on a "run" (that is responding to a request for assistance when and where the engine or truck company actually left the station en route to the call) 81,214 times. This is how many "runs" the SJFD had for that fiscal year, or basically, how busy apparatus was during that year.

That equates to an average of 1,805 runs per company for fiscal year 2009-10. Factoring how many people are in each engine or truck, the average "firefighter" including "captains, fire engineers, or firefighter/paramedics" responded to 1,792 runs for the fiscal year, or 5 runs per day. Since closure of four engine companies and one truck company, this figure has increased to 6 runs per day per company. These figures do not include many types of calls, such as battalion chief responses, special apparatus responses, fire watch, move-ups, etc. These figures also do not reflect the length of each call, with some taking one hour while others require four or more hours on scene. These figures also do not reflect the burden some companies carry by responding to 15 or more runs daily.

Summary of Data Corrections

Table 86 should be revised as follows for San Jose Fire Department data:

San Jose population = 1,023,084

Total Apparatus: 58.75

Staffing: 2 apparatus with 5 person staffing

21.25 apparatus with 4 person staffing

8 apparatus with 3 person staffing

26.5 apparatus with 2 person staffing

1 apparatus with 1 person staffing

Operating cost per daily staffed apparatus ($\$126,926,383 / 58.75$) = \$2,160,449

Number of Three Person Equivalents = 57.67

Operating Cost Per Three Person Apparatus Equivalent = \$2,201,036

We have included an Excel Worksheet setting some forth some of correction data.

Additionally, the numerous individual data points addressed earlier should be reviewed and corrected.

Conclusion

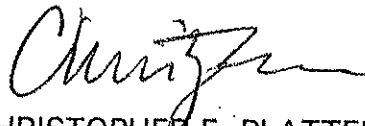
Table 86 of the Revised Report does not accurately reflect the operating cost per daily staffed apparatus or 3-person company equivalents because the data does not accurately reflect true apparatus staffing. The operating costs per daily staffed apparatus for the San Jose Fire Department is in fact considerably less than the \$3,095,765 reflected in Table 86 and should be changed to reflect the figure of \$2,160,449.

Moreover, the Revised Report fails to disclose let alone analyze the workload experienced by the average firefighter per agency. This workload data is important since as the Revised Report indicates elsewhere than Table 86 fiscal demands upon the agencies may result in a reduction in the number of apparatus available to meet service needs. When the number of apparatus or companies are reduced, workload per firefighting personnel increases which carries with it inevitably an increase in workers' compensation and disability benefit costs otherwise left unexamined by the Revised Report.

On behalf of Local 230, we request that the Commission continue to analyze these issues as discussed in this comment letter.

If you have any questions, we would be more than pleased to answer them at the LAFCO final public hearing on the Revised Report on December 15, 2010 at 1:15 p.m.

Very truly yours,



CHRISTOPHER E. PLATTEN

CEP:imt

cc: Randy Sekany, President IAFF Local 230

I:\0230\00230\cor\2010\palacherla.doc

From: Don Jarvis [don.jarvis@cnt.sccgov.org]
Sent: Wednesday, December 01, 2010 2:51 PM
To: Palacherla, Neelima
Cc: Ken Waldvogel
Subject: Comments on Fire Service MSR revised draft

Pg 6-
Accountability for Community Service...
Three cities and two districts contract for service. Three Districts contract for service: Saratoga and Los Altos Hills contact with County Fire; South County contracts with CAL FIRE.

Pg 32-
Table 5 - The Primary PSAP for all Unincorporated areas is County Comm. The CAL FIRE center is a Secondary PSAP.

Pg 43-
4.2.2 Decrease in fund balance was due in part to Prop 1A, the one-time loan of \$557,890 to the State, to be repaid with interest in 2013.

Pg 87-
4.8.1 Annexation of more than 20,000 acres in sphere of influence was finalized September 2010.

Pg 89-
4.8.2 Decrease in fund balance was due in part to Prop 1A, the one-time loan of \$4.18M to the State, to be repaid with interest in 2013. CCFD also absorbed Saratoga Fire District's \$410,000 Prop 1A loss.
4.8.3 Stations: 8 excellent, 8 good, 1 fair.

Pg 127-
Gilroy and CCFD rotate providing 24-hour coverage; Gilroy 112 hours per week and CCFD 56 hours per week.

Pg 127-
Any of the three current communication operations could serve this role, given appropriate enhancements to staffing, equipment, and training.

Pg 127-
South County Fire District could potentially experience offsetting savings if communications were contracted to County Comm, Gilroy, or some other regional center. SCFD specifically contracts for dispatch personnel beyond what the State provides.

Pg 128-
Table 84 Note 2: A portion of one company and one Battalion Chief are paid for by the State of California. It is unclear from the data whether the funding provided by the State is included in the figures presented for SCFD. Other departments in the county receive funding for companies and chief officers from outside agencies. These other departments reported the revenue and expenditures in their figures.

Pg 129-
SCFD is highest cost per capita, according to Table 84

Pg 146-

5.13.5 three platoons

Pg 164-

6.9 Annexation of 20,000 acres completed in September 2010.

Pg 177-

7.2.3 The area on the northeast edge of the district in the Hicks Rd / Pheasant Rd area (Rancho De Guadalupe Open Space Preserve) is in the Town of Los Gatos SOI and CCFD is the fire provider for Los Gatos. The area should remain in the Fire District SOI; if annexed to the Town, it must be concurrently annexed to the District.

Given the recommendation in 7.4.3, does the CCFD SOI need to be specifically expanded to include the area currently within the Saratoga Fire District SOI?

P 184-

7.4.2 With the annexation of 20,000 acres by CCFD in September 2010, the SOI of the SFD is completely surrounded by the CCFD

Don Jarvis
Deputy Chief
Santa Clara County Fire Dept.
14700 Winchester Blvd.
Los Gatos, CA 95032
(408) 896-6880

Palacherla, Neelima

COUNTY COMMUNICATIONS

From: Hildebrand, Bert
Sent: Friday, December 03, 2010 4:46 PM
To: Noel, Dunia; Palacherla, Neelima
Attachments: LAFCO Draft Report comments.docx

Importance: High

Hello Noel and Neelima,

I have read both original and redline edit version of LAFCO's 2010 Revised Draft Countywide Fire Service Review Report and am very pleased with the overall document. I found it to be very informative and will use it as a reference document in the future. It was also pleased to see Public Safety Answering Points (PSAPs) or 9-1-1 Communications Call Centers considered in this year's report. I have already been involved in a few meeting/discussions on the consideration of potential 9-1-1 Call Center consolidations, which have gained momentum since the release of the LAFCO report. Future studies might consider breaking out the details and costs further to include communications services.

I have attached my suggested comments/edits for your consideration.

Please feel free to contact me should you have any questions regarding my attached file.

Sincerely,

Bert Hildebrand, Director
County Communications Department
2700 Carol Drive
San Jose, CA 95125

Bus: (408) 977-3205
Fax: (408) 279-2666

LAFCO Draft Report Recommended Edits – Bert Hildebrand, Director, County Communications

Section 3.8 Communications:

- Page 29, 1st paragraph, 1st bullet point – currently states “**First responder fire unit dispatch.** Notification from the primary public safety answering point (PSAP) to the fire/paramedic unit responsible for the initial incident response.” We would recommend amending this sentence to state: “**First responder fire unit dispatch.** Notification from the primary public safety answering point (PSAP) to the Secondary PSAP responsible for the initial fire/paramedic unit incident response.”
- Page 29, 3rd paragraph, last sentence states: “In cases where a police department is the PSAP, all calls requiring an ambulance response are transferred to County Comm.” We would recommend amending this sentence to say “In most cases where a police department is the PSAP, information from calls requiring an ambulance response are transferred to County Comm to initiate an ambulance response.”

Unless resources are fully depleted by current calls, Palo Alto handles most of their ambulance transport requests without assistance from County Communications. Also many Secondary Fire/EMS PSAPs continue processing medical calls and provide EMD pre-arrival instructions, during which County Communications is notified of the need for ambulance transport. As written, the initial statement could be misinterpreted that we complete the entire process (call answer, EMD, and ambulance transport dispatch) for all law PSAPs.

- Page 30-32, Table 5 corrections:

2nd column, “Primary Public Safety Answering Point (PSAP)” – City of Monte Sereno – “Police Dept” not “County Comm”

2nd column, “Primary Public Safety Answering Point (PSAP)” – should read “County Comm.” Only, CAL FIRE is a Secondary PSAP and all 9-1-1 calls are initially received and processed by County Comm.

- Page 32, 2nd paragraph :

1st sentence states “SVRIA has been approved for federal funding to begin the process.” Recommend amending to state “SVRIA has submitted a FY 2010 UASI grant funding request for approval and the County has allocated \$810,000 to begin this process.”

Last sentence states “Grant funds to begin the work will be available in 2011.” Recommend amending to state “Grant funds to begin the work, if approved, will be available in 2011.”

City of Gilroy

Section 4.1.7 Apparatus, page 36, 2nd sentence, amend “Most apparatus is ...” to “Most apparatus are...”

City of Santa Clara Fire Department

Section 4.7.8 Service Delivery, page 82, 1st sentence “Dispatch is provided by the Santa Clara City Police Department, with EMD calls transferred to the Santa Clara County Communications Center.” City of Santa Clara dispatchers provide EMD services. We would recommend amending to state “Dispatch is provided by the Santa Clara City Police Department, with information from medical/EMD calls transferred to the Santa Clara County Communications Center to initiate an ambulance response.”

South Santa Clara County Fire District

Section 4.9.8 Service Delivery, page 103, 1st sentence states "Santa Clara County Communications is the public service answering point for emergency calls within the service area of the South County Fire District." Amend to state "Santa Clara County Communications is the public safety answering point for emergency calls within the service area of the South County Fire District." (Use safety rather than service)

Section 5.4 Communications, page 132, 3rd paragraph, 4th sentence states "SVRIA has been approved for federal funding to begin the process." Recommend amending to state "SVRIA has submitted an FY 2010 UASI grant funding request for approval and the County has allocated \$810,000 to begin this process."

The last sentence in the 3rd paragraph, page 132-133, states "Grant funds to begin the work will be available in 2011." Recommend amending to state "Grant funds to begin the work, if approved, will be available in 2011."

Section 5.4, page 133, 5th paragraph, 3rd sentence states: "In cities, the fire call volume is a small portion of overall dispatch activity; police typically amount for 90% or more of the calls." This percentage seems too high. Is it limited to response to fires only? Does it take into account fire response on emergency medical calls? Is it limited to calls from the public? Does it include officer field generated calls?

City of San Jose

Section 6.7, under "Status of and opportunities for shared facilities" heading, page 162, second bullet, states "Communications is provided by a fire unit in the police department communications division." We believe this is incorrect and should say "Communications is provided by a fire unit in the fire department communications division."

Attachment A, Definitions and Acronyms

Table 87, page 189-190, Recommend revising as follow:

- County Comm – County of Santa Clara Communications Department is the communications/dispatch center for the Santa Clara County Central Fire Protection District and countywide emergency ambulance dispatch, except for the City of Palo Alto.
- Mutual Aid – One or more agencies providing support to another agency upon request normally at no cost.

Table 88, page 190-192, Recommend revising as follows:

- FTE – Full Time Equivalent employee
- Add "STAR – Supplemental Transport Ambulance Resource"

Attachment C: Fire Agency Information, starting on page 196, column 1, table row headings

- Would recommend changing title "Mutual aid arrangements" to "Mutual and Auto Aid arrangements"

South Santa Clara County Fire Protection District Detail, page 249, Dispatch arrangement, recommend it be revised to state:

The South Santa Clara County Fire Protection District contracts with Cal Fire Morgan Hill Emergency Command Center as their secondary 911 Public Safety Answering Point for Fire/EMS services. Primary 911 Public Safety Answering Point for law enforcement and emergency medical dispatch (EMD) services are provided by County Comm.

SANTA CLARA COUNTY LAFCO
2010 Fire Service Review
Comments Received on November 3, 2010 Revised Draft Report

Commenting Agency: City of Morgan Hill

Date: 11/16/2010

Page	Section/ Table	Comment	Response
123	5.2	<p>After the final paragraph, the City recommends that LAFCO insert the "South County Regional Fire/EMS Expenses & Assessed Valuation" graph and the following paragraph. Both of these are from the November 10 report.</p> <p>Over the past year, the South County agencies have adopted budgets and changes to cost structure needed to meet the fiscal challenges of declining revenues. As part of the South County regional study, the region's change in assessed valuation and expenditures for fire and EMS from FY 2005/06 to present was evaluated. As expected, the region's total assessed valuation has declined the past two years. At the same time, although Gilroy has reduced its fire service costs, other agency fire service cost increases have counteracted that effect and the region's total fire and emergency medical services expenses have ultimately increased.</p>	<p>Comment noted. The comment is at a level of detail beyond the scope of this review</p>
125	5.2	<p>In the first paragraph, the revised draft report states that "SCFD is the lowest cost provider of service on all measures analyzed." However, the revised numbers in Table 84 indicate that CCFD is the lowest cost provider on a per capita measurement, while SCFD is the lowest cost provider on per company and per sworn personnel measurements. The City would also appreciate LAFCO revising Table 84 "Service Population" column to show Morgan Hill's population at 40,200.</p>	<p>Edit report text to reflect the data in Table 84. Population numbers are from ABAG data available at the time the report was prepared and are used consistently for all cities and agencies.</p>

125	5.2.1	<p>At conclusion of this section, the City recommends adding the following narrative so that this information is formally included in LAFCO's report.</p> <p>On November 10, 2010, the South County regional study ad-hoc committee discussed a range of options to achieve regionalization of fire/EMS: from opportunities for interagency collaboration within the existing framework to options for consolidating fire and emergency medical services in South County. The report also included a preliminary analysis of the options by addressing the issues of governance, management, and financing.</p> <p>At the conclusion of the meeting, the ad-hoc committee agreed that the individual governing bodies should independently discuss the conditions in which each agency is interested in pursuing regionalization. The goal is for each agency to provide its conditions by February 2011 so that the ad-hoc committee can meet again in February or March to review the information and determine the study's next steps.</p>	<p>Comment noted. The comment pertains to activities that occurred after the publication of the revised draft MSR on November 3, 2010.</p>
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* Pages
are those
in the
redlined
draft
dated
December
8, 2010

SANTA CLARA COUNTY LAFCO
2010 Fire Service Review
Comments Received on November 3, 2010 Revised Draft Report

Commenting Agency: Sunnyvale Department of Public Safety

Date:

Page*	Section/ Table	Comment	Response
169	6.12	There is no discussion of the unique nature of DPS and how it would make LAFCO's call for consolidation with MTV and SNC difficult. You must remember that SNY BCs also fill the role of Police Watch Commander in SNY. A MTV or SNC BC could not do that.	Edit section 6.12, page 169, <i>Accountability for community service needs, including governmental structure and operational efficiencies,</i> determination statement to note the difficulty to consolidation presented by Sunnyvale's Public Safety structure.
21		HAZMAT Typing....The current version is unedited from the first. Here are the original comments I submitted then. Hazardous Materials Response Only two agencies have passed the formal Typing by the State of California. Santa Clara County Central is a Type 1. SNY is a Type 2. I believe San Jose has to-date not passed the State requirements as a Type 1.	Edit report to reflect that as of publication date of the revised draft the CCFD was the only State Certified Type I department. San Jose has developed all Type I capability and was certified in December 2010.
141	5.13.1	No mention of the Public Safety Concept and the consolidation issues Combining Departments There should be some indication of the Public Safety Concept and that the movement to fire consolidation would require additional staff to place the County standard of 3 on an apparatus and would defeat the Public Safety model	Comment noted. Discussion in this section is general in nature. Sunnyvale's public safety structure is noted in other report sections.
141	5.13.2	Shared Battalion Chiefs In order to meet this area, the shared resources would also need to have Law Enforcement so they assume a Law Enforcement Command Role as required. Staffing has increased 14% between FY 2007-08 and FY 2010-11.	Comment noted. Discussion in this section is general in nature. Sunnyvale's public safety structure is noted in other report sections.
167		This was due to Department reporting structure reorganization and not the addition of Staff. We should make sure that is reflected properly to not give the impression we added staff when in fact we are removing SWORN Staff and replacing with Civilian Professionals.	Comment noted. Note on staffing is included.

249		<p>Still show's 11 engines still not 9</p> <p>o How many companies does the Sunnyvale Fire Department staff daily?</p> <p><input type="checkbox"/> Sunnyvale Staffs 9 Engine Companies, 2 Truck Companies and a HazMat Company 247. We also have two Engines (unstaffed) in Reserve.</p>	Edit report to reflect comment
134-135	Table 86	<p>Operating Costs</p> <p>o Analyzing the data poses some contradiction, because of the Public Safety Model. Specifically, because we minimally staff a Fire Service augmenting it with Patrol resources, our cost per firefighter appears high. However, all other metrics are extremely low, or are the lowest of all cities, as one would expect. This is merely the mathematics of dividing the overall budget by minimally staffed service. I think that some (particularly the media) will focus on the sensational aspect of one metric and ignore all others. It would be extremely helpful, and I believe more valid to separate Sunnyvale from the rest of the table, through a break in the rows, heavy borders and/or shading of the whole row with adjacent comment instead of just a footnote (#9).</p>	<p>Comment noted. Adequate explanation is contained in the text regarding the limitations of comparative data. Different measures were introduced to recognize this limitation rather than focus on one measure.</p>
* Pages are those in the redlined draft dated December 8, 2010			

SANTA CLARA COUNTY LAFCO
2010 Fire Service Review
Comments Received on November 3, 2010 Revised Draft Report

Commenting Agency: San Jose IAFF Local 2030

Date: 11/30/2010

Page*	Section/ Table	Comment	Response
		Major Items	
		The Revised Report does not set forth any workload assessment, i.e., the number of calls per service per firefighter in each agency listed.	Comment noted. A detailed workload assessment by agency was not in the scope of work for the municipal service review. Attachment D. contains 2009 call volume information for each station as provided by the departments.
138	Table 86		Table 86 has been edited to contain information provided by Fire Department management to reflect 2010-11 conditions. This is: 26 Engines with 4 person crews; 4 engines with 2 person crews; 2 trucks with 5 person crews; 7 trucks with 3 person crews; 5 medic units with 2 person crews; 2 brush patrols with 2 person crews; 4 light units with 2 person crews; 1 HazMat unit with a 2 person crew and 1 USAR with a 5 person crew. This results in a material change to the SJFD number of daily staffed apparatus and operating cost per daily staffed apparatus. San Jose splits certain engine and truck companies to operate two pieces of apparatus-- the engine or truck and either a medic unit, bush patrol, or light unit. This was not factored in to the November 3, 2010 Revised Draft which under reported the number of daily staffed apparatus.
		Incorrect information on number of apparatus and apparatus staffing.	
		Specific Items	

	San Jose Fire Department does not staff single truck apparatus with six personnel.	Edit report to reflect the SJFD does not any apparatus with six personnel.
		Comment noted. The statement is correct. SJFD Airport operations are included in the report. Airport fire/rescue activity is a responsibility of the SJFD.
	The Revised Report includes Airport operation costs (staffing, payroll) in much of the analysis.	See response to comment 6, above.
	The Revised Report indicates that SJFD operates a "Rescue Medic 28," which does not exist.	Edit report on page 215 to reflect ISO ratings from 3--9 as provided by the department. ISO ratings are assigned by the Insurance Service Office; it is not a program that a fire department can choose to participate in or not. San Jose, like some other departments, does not incorporate ISO data into the assessment of their systems.
	The report indicated that the department's ISO rating "varies from 3 to 9," but later reports correctly that the City and the department do not participate in any ISO rating.	Edit report to reflect that engines are evaluated for replacement at after 17 years of service and trucks after 20 years. Depending on the condition of the apparatus, it may remain in service beyond these time frames.
	The Revised Report states "Engines are replaced at every 17 years; trucks at 20 years." In fact, apparatus are only evaluated for replacement at that time and the department operates many apparatus well beyond 20 years.	Comment noted. Information provided by the department reflects that all front line engines and trucks reported in use at the time of publication of the draft report were consistent with the replacement policy.
	The Revised Report states "All line apparatus are consistent with the replacement cycle." In fact, the department operates numerous line apparatus that exceed these timelines, including Engines dating from 1983-1990 and a Truck from 1988. All are front line apparatus.	Edit table 45 on page 74 to be consistent with the text of Section 4.6.7. This will reflect the information provided by the department that on the publication date of the draft report the department staffed on a daily basis 30 engines, 9 trucks and 2 rescue apparatus.
	The Revised Report correctly identifies that the department does not operate designated "reserve" apparatus, but goes on to state the department only operates 29 engines. Further, the report states there is one USAR apparatus when I in fact there are two USAR apparatus staffed daily.	

		<p>The Revised Report includes some dedicated staffed "overhead" apparatus, such as Battalion Chief vehicles, while excluding others, such as the Public Information Officer, Duty Chief, Command Van, and others. Further, the report excludes other apparatus such as Foam 29, etc.</p>	<p>No change. Operational and financial analysis in the report focused on the personnel and apparatus dedicated to direct daily emergency response. Administrative and support vehicles were not included.</p>
		<p>The Revised Report indicates that Station 34 is staffed with Light Unit 34, which does not exist at Station 34 or any other station.</p>	<p>Edit report to reflect that at the time of publication of the draft report Station 34 was staffed with a 5 person crew rescue unit.</p>
		<p>The Revised Report incorrectly depicts the placement of numerous apparatus, such as Water Tender 2, Truck and Rescue Medic 4, etc. In some areas of the report, apparatus deployment from 2009 is reflected, while in other areas, apparatus deployment from 2010 is reflected (impacted by the closure of four engines and one truck company). In some cases, the new apparatus placement configuration is matched to old response data, incorrectly displaying the utilization of each apparatus.</p>	<p>Comment noted. The original information gathered for the report reflected 2009 call volumes and 2009/10 budgets. A decision was made in the process of drafting the report to gather financial and operational information for 2010-11 budgets. This was done in recognition of the impact current financial conditions were having on many departments and resulting changes in apparatus and staffing. Where information is used to make comparisons between departments, reasonable steps have been taken to make those comparisons on an "apples to apples" basis.</p>
		<p>"Calls for service" throughout the report are not accurately defined and do not reflect the actual utilization of each apparatus, significantly understating their use.</p>	<p>Comment noted. As noted on in Section 2.3.4, page 15: <i>"Different budgeting practices, service program structures and categorization of service calls and responses make precise assessment and comparison impossible in the scope of the assignment. For example: some fire agencies include the move-ups of apparatus to cover for a responding apparatus in their response statistics while others do not..."</i></p>

* Pages are those in the redlined draft dated December 8, 2010

SANTA CLARA COUNTY LAFCO
2010 Fire Service Review
Comments Received on November 3, 2010 Revised Draft Report

Commenting Agency: Santa Clara County Central Fire Protection District

Date:

Page*	Section/ Table	Comment	Response
6		Accountability for Community Service... Three cities and TWO districts contract for service. THREE Districts contract for service: Saratoga and Los Altos Hills contract with County Fire; South County contracts with CAL FIRE	Edit report to reflect three contract districts
32	5	The Primary PSAP for all Unincorporated areas is County Comm. The CAL FIRE center is a Secondary PSAP.	Edit table 5 to reflect County Comm as the primary PSAP for the unincorporated area.
43	4.2.2	Decrease in fund balance was due in part to Prop 1A, the one-time loan of \$557,890 to the State, to be repaid with interest in 2013.	Comment noted. The purpose in the report is to reflect the overall financial condition and not to analyze how that condition has been impacted by specific events.
85	4.8.1	Annexation of more than 20,000 acres in sphere of influence was finalized September 2010	Edit report to reflect September 2010 as the effective date of annexation.
87	4.8.2	Decrease in fund balance was due in part to Prop 1A, the one-time loan of \$4.18 million to the State, to be repaid with interest in 2013. CCFD also absorbed Saratoga Fire District's \$410,000 Prop 1A loss.	Comment noted. The purpose in the report is to reflect the overall financial condition and not to analyze how that condition has been impacted by specific events.
87	4.8.3	Stations: 8 excellent, 8 good, 1 fair	Edit report to reflect ratings
123		Gilroy and CCFD rotate providing 24-hour coverage; Gilroy 112 hours per week and CCFD 56 hours per week	Edit report to reflect that Gilroy provides 24 hour BC coverage 4 out of a 6 day cycle and Central 2 out of a 6 day cycle
123		Any of the three current communication operations could serve this role, given appropriate enhancements to staffing, equipment, and training	Edit report to use "any" rather than "either"
123		South County Fire District could potentially experience offsetting savings if communications were contracted to County Comm, Gilroy, or some other regional center. SCFD specifically contracts for dispatch personnel beyond what the State provides.	Edit report to reflect that costs of contracting for fire communication would likely increase costs for Gilroy. Additional analysis would be required to determine the impact on the communication costs of SCFD.

124	<p>Note 2: A portion of one company and one Battalion Chief are paid for by the State of California. It is unclear from the data whether the funding provided by the State is included in the figures presented for SCFD. Other departments in the county receive funding for companies and chief officers from outside agencies. These other departments reported the revenue and expenditures in their figures.</p>	<p>Comment noted. The situation in SCFD is not analogous to contracts for services that other cities or districts may have for service provision. In the latter, the direct beneficiaries of the service, e.g., the contracting city, are paying the contracting department. In the case of SCFD, a portion of an engine is subsidized by the State. This provides a unique cost savings to the properties in SCFD that cannot be replicated in most other situations. The footnote draws attention to this circumstance as the costs of the state funded portion is not included in the SCFD budget.</p>
125	SCFD is the HIGHEST cost per capita, according to Table 84	Edit report to reflect Table 84 numbers.
142	5.13.5	Edit report to reflect three platoons
160	6.9	Edit report to reflect that the annexation was effective in September 2010.
173	<p>The area on the northeast edge of the district in the Hicks Rd / Pheasant Rd area (Rancho De Guadalupe Open Space Preserve) is in the Town of Los Gatos SOI and CCFD is the fire provider for Los Gatos. The area should remain in the Fire District SOI; if annexed to the Town, it must be concurrently annexed to the District.</p> <p>Given the recommendation in 7.4.3, does the CCFD SOI need to be specifically expanded to include the area currently within the Saratoga Fire District SOI?</p>	<p>Comment noted. These lands are within the Mid peninsula Regional Open Space District. Only a small portion of these lands are currently within the urban service area (USA) of the Town of Los Gatos. Los Gatos does not intend to annex these lands and has submitted an application (currently incomplete) for retraction of its USA to exclude these lands.</p>
180	7.4.2	Edit report to reflect that the annexation was effective in September 2010.
<p>* Pages are those in the redlined draft dated December 8, 2010</p>		

SANTA CLARA COUNTY LAFCO
2010 Fire Service Review
Comments Received on November 3, 2010 Revised Draft Report

Commenting Agency: Santa Clara County Communications

Date: 12/3/2010

Page*	Section/ Table	Comment	Response
29	3.8	1st paragraph, 1st bullet point – currently states "First responder fire unit dispatch. Notification from the primary public safety answering point (PSAP) to the fire/paramedic unit responsible for the initial incident response." We would recommend amending this sentence to state: "First responder fire unit dispatch. Notification from the primary public safety answering point (PSAP) to the Secondary PSAP responsible for the initial fire/paramedic unit incident response."	Edit report to reflect comment.
30	3.8	3rd paragraph, last sentence states: "In cases where a police department is the PSAP, all calls requiring an ambulance response are transferred to County Comm." We would recommend amending this sentence to say "In most cases where a police department is the PSAP, information from calls requiring an ambulance response are transferred to County Comm to initiate an ambulance response." Unless resources are fully depleted by current calls, Palo Alto handles most of their ambulance transport requests without assistance from County Communications. Also many Secondary Fire/EMS PSAPs continue processing medical calls and provide EMD pre-arrival instructions, during which County Communications is notified of the need for ambulance transport. As written, the initial statement could be misinterpreted that we complete the entire process (call answer, EMD, and ambulance transport dispatch) for all law PSAPs.	Edit report to reflect comment.
30-31	Table 5	2nd column, "Primary Public Safety Answering Point (PSAP)" – City of Monte Sereno – "Police Dept" not "County Comm" 2nd column, "Primary Public Safety Answering Point (PSAP)" – should read "County Comm." Only, CAL FIRE is a Secondary PSAP and all 9-1-1 calls are initially received and processed by County Comm.	Edit report to reflect comments.

32		1st sentence states "SVRIA has been approved for federal funding to begin the process." Recommend amending to state "SVRIA has submitted a FY 2010 UASI grant funding request for approval and the County has allocated \$810,000 to begin this process." Last sentence states "Grant funds to begin the work will be available in 2011." Recommend amending to state "Grant funds to begin the work, if approved, will be available in 2011."	Edit report to reflect comment.
36	4.1.7	2nd sentence, amend "Most apparatus is ..." to "Most apparatus are..."	Edit report to reflect comment.
80	4.7.8	1st sentence "Dispatch is provided by the Santa Clara City Police Department, with EMD calls transferred to the Santa Clara County Communications Center." City of Santa Clara dispatchers provide EMD services. We would recommend amending to state "Dispatch is provided by the Santa Clara City Police Department, with information from medical/EMD calls transferred to the Santa Clara County Communications Center to initiate an ambulance response."	Edit report to reflect comment.
99	4.9.8	1st sentence states "Santa Clara County Communications is the public service answering point for emergency calls within the service area of the South County Fire District." Amend to state "Santa Clara County Communications is the public safety answering point for emergency calls within the service area of the South County Fire District." (Use safety rather than service)	Edit report to reflect comment.
128	5.4	3rd paragraph, 4th sentence states "SVRIA has been approved for federal funding to begin the process." Recommend amending to state "SVRIA has submitted an FY 2010 UASI grant funding request for approval and the County has allocated \$810,000 to begin this process." The last sentence in the 3rd paragraph, page 132-133, states "Grant funds to begin the work will be available in 2011." Recommend amending to state "Grant funds to begin the work, if approved, will be available in 2011."	Edit report to reflect comments.
133	5.4	5th paragraph, 3rd sentence states: "In cities, the fire call volume is a small portion of overall dispatch activity; police typically amount for 90% or more of the calls." This percentage seems too high. Is it limited to response to fires only? Does it take into account fire response on emergency medical calls? Is it limited to calls from the public? Does it include officer field generated calls?	Edit report to note that police dispatch activity in a combined police fire communication center can range up to 90% of calls. This is based on an informal assessment by selected police chiefs and not a detailed study of the calls of specific agencies.

158	6.7	second bullet, states "Communications is provided by a fire unit in the police department communications division." We believe this is incorrect and should say "Communications is provided by a fire unit in the fire department communications division."	Edit report to reflect that the police communications division is the primary PSAP with fire and medical calls transferred to the fire department communications division for unit dispatch and EMD.
185-186	Table 87	<ul style="list-style-type: none"> County Comm – County of Santa Clara Communications Department is the communications/dispatch center for the Santa Clara County Central Fire Protection District and countywide emergency ambulance dispatch, except for the City of Palo Alto. Mutual Aid – One or more agencies providing support to another agency upon request normally at no cost. 	
190-192	Table 88	<ul style="list-style-type: none"> FTE – Full Time Equivalent employee Add "STAR – Supplemental Transport Ambulance Resource" column 1, table row headings 	Edit report to reflect comment.
196		<ul style="list-style-type: none"> Would recommend changing title "Mutual aid arrangements" to "Mutual and Auto Aid arrangements" 	Comment noted. Edit report to include STAR
245		<p>Dispatch arrangement, recommend it be revised to state: The South Santa Clara County Fire Protection District contracts with Cal Fire Morgan Hill Emergency Command Center as their secondary 911 Public Safety Answering Point for Fire/EMS services. Primary 911 Public Safety Answering Point for law enforcement and emergency medical dispatch (EMD) services are provided by County Comm.</p>	Comment noted.
			Edit report to reflect comment

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SANTA CLARA COUNTY LAFCO

2010 Fire Service Review

Comments Received on November 3, 2010 Revised Draft Report

Commenting Agency: Saratoga Fire District

Date: 10/18/2010

Page*	Section/ Table	Comment	Response
8	1.4.3	The Report makes a blanket assumption, with absolutely no factual support, that a dissolution of SFD and annexation of its territory to the County Central Fire Protection District ("CCFD") "would result in reduced administrative costs and would make accountability for service more transparent." Elsewhere in the Report, it is stated that consolidation of SFD with CCFD would produce estimated annual savings of \$188,000, but the Report contains no discussion as to how this number was determined.	Edit Section 5.3.1, page 130, to reflect that initial administrative savings are estimated at \$118,000 annually. This figure is derived from the SFD 2010-11 budget; it reflects all administrative costs less retiree medical payments which would continue for a period of time after dissolution. The cost of fire protection by CCFD would continue as would loan payments. The statement in Section 1.4.3 reflects the opinion of the consultant based upon the overall review of the circumstances related to the LAFD and SFD.
180	7.4.3	We have no objection to the establishment of a zero sphere of influence for SFD. However, it does not logically follow that because the District has no SOI it should therefore be dissolved, as suggested in Section 7.4.3 of the Report. The District had never existed for the purpose of annexing territory within an adjacent SOI; it was established to provide fire protection service within its own territory and is still serving that function 87 years later and does not require an SOI to do so.	Comment noted. The report presents the dissolution of the SFD and annexation of its lands to the CCFD as an alternative; it presents an opportunity to improve efficiency and economy by providing services with lower administrative costs, and improve clarity of the responsibility for service delivery.
Various		Since the Report is only in draft form, we request that all references to the dissolution, consolidation, or annexation of SFD and its merger with CCFD be deleted from the final report.	Comment noted. The report presents the dissolution of the SFD and annexation of its lands to the CCFD as an alternative; it presents an opportunity to improve efficiency and economy by providing services with lower administrative costs, and improve clarity of the responsibility for service delivery.

* Pages are those in the redlined draft dated December 8, 2010

SANTA CLARA COUNTY LAFCO
2010 Fire Service Review
Comments Received on November 3, 2010 Revised Draft Report

Commenting Agency: Palo Alto Fire Department

Date: 10/12/2010

Page*	Section/ Table	Comment	Response
63	4.5.3	City of Palo Alto Overview The City's capital improvement program does <u>NOT</u> contain funding to bring stations 3 and 4 to good conditions	Edit report to reflect funding is not identified to bring stations 3 and 4 into good condition.
134-135	Table 86	Apparatus Staffing <input type="checkbox"/> We do not have any apparatus with 4 person crew. Should be 10 apparatus with 3 person crew <input type="checkbox"/> Should be 1.5 apparatus with 2 person crew (One 24 and one 12 hour medic van) <input type="checkbox"/> Footnote 6 – For four months of the year, an additional engine is staffed on a 12 hour shift	Comment noted. Table 86 reflects 9 apparatus staffed daily year round with 3 person crews and 1.5 apparatus with two person crews. The seasonally staffed engine at station 8 is reflected in the 3 company equivalent column. Edit foot note 6 to reflect 12 hour staffing.

* Pages are those in the redlined draft dated December 8, 2010

